REMARKS

Administrative Overview

Claims 1-20 were presented for examination. Claims 1, 2, 4-9, 12, and 14-18 were rejected under 35 U.S.C. 103(a) as obvious over U.S. Patent No. 5,802,281 to Clapp et al. ("Clapp") in view of U.S. Patent No. 6,483,515 to Hanko ("Hanko"). Claims 3, 10, 11, 13, 19, and 20 were rejected under 35 U.S.C. 103(a) as obvious Clapp in view of Hanko in further view of U.S. Patent Application No. 2003/0084052 to Peterson ("Peterson"). Upon entry of this response, claims 1-20 will be presented for examination.

Rejections of claims 1, 2, 4-9, 12, and 14-18 under 35 U.S.C. 103(a)

Claims 1, 2, 4-9, 12, and 14-18 were rejected under 35 U.S.C. 103(a) as obvious over Clapp in view of Hanko. Applicants respectfully traverse this rejection.

To establish a prima facie case of obviousness with respect to a claim, it is necessary that the prior art references, either alone or in combination, teach or suggest each and every limitation of the rejected claims. The Applicants respectfully submit that Clapp and Hanko, either alone or in combination, do not teach or suggest each and every limitation in claims 1, 2, 4-9, 12, and 14-18.

Independent claims 1 and 12 both require that the server *instructs* the client to select a first memory region for allocation to an off-screen surface, and *instructs* the client to copy the graphical data associated with the indicia to a particular location within the first memory region. Neither Clapp nor Hanko teach or suggest these limitations.

Clapp discusses a peripheral video conferencing system that communicates via analog and digital communication channels for transmitting video, audio, and other information from either a local or remote conferencing site. Clapp discusses that the peripheral audio/visual conferencing system operates in cooperation with a host computer system and visual conferencing application software to provide window sharing and document collaboration functions which may be initiated at either a local or remote conferencing site (see Clapp FIGS. 11 and 12).

The local host computer copies screen data to an off-screen buffer (Col. 11, lines 33-41):

> The user, at step 628, then selects a local active application window 602 from the menu 600 for sharing with a remote conferencing site. The local host computer system 244, at step 630, preferably allocates an appropriate amount of system memory to accommodate a local off-screen window buffer 604 and a local pixel update table 606. A copy of the pixels or pixel data defining the local active window 602 is transferred to the local off-screen window buffer at step 632.

The local host computer transmits the contents of its off-screen buffer to the remote host computer (Col. 11, line 65 – Col. 12, line 1, Col. 12, lines 11-17):

> At an appropriate time, the pixel data residing in the local off-screen window buffer 604 is transferred to the local audio/visual communication system 242 for transmission over the communication channel 82 at step 644.
>
> After establishing a communication link between the local and remote host computer systems 244 and 264, a full update of pixel data associated with the video image of the entire local active window 602 as reflected in the local off-screen window buffer 604 is initially transmitted over the communication channel 82 and received by the remote audio/visual communication system 262 at step 650.

The remote host computer copies the local host computer off-screen buffer contents to its off-screen buffer (Col. 12, lines 17-22):

> The pixel data associated with the entire local active window 602 is first copied to the remote off-screen window buffer 610 at step 652, and subsequently transferred at step 654 to the remote active window 608 presented in the foreground of the remote display 268.

As shown and described in Clapp, the local host computer does not instruct the remote host computer to copy the off-screen buffer contents. Instead, the remote host computer performs the copying on its own. Therefore, Clapp does not teach a server that instructs the client to select a first memory region for allocation to an off-screen surface, and instructs the client to copy the graphical data associated with the indicia to a particular location within the first memory region.

Also, Clapp fails to suggest a server that instructs a client to select a first memory region for allocation to an off-screen surface, and instructs the client to copy the graphical data associated with the indicia to a particular location within the first memory region. There is no suggestion of these features because in Clapp a peripheral video conferencing system is present at both a local and a remote conferencing site and communicates with a respective host computer system. Neither of the peripheral video conferencing system at the local or at the remote conferencing sites instructions the other to do anything because, in order to permit document sharing and collaboration each of the peripheral video conferencing system needs to be able to operate independent of control of the other.

Hanko does nothing to cure the deficiencies of Clapp. Hanko is generally directed to updating a display device to fill a display area on the display device with a tiled pattern including repetitions of a tile image data stored at a host system interconnected to a remote system via a communication link. To achieve this result, the Hanko system transmits an image from a service computer system to a Human Interface Device ("HID"), which copies and replicates the image into an ***on-screen*** frame buffer to provide a background image on the HID.

The HID receives a single tile image and stores the tile image in an on-screen buffer (Col. 4, lines 59-64):

> The HID 321 receives the display information and generates the tile pattern by performing steps including storing the tile image data starting at a location in an on-screen frame buffer corresponding to a coordinate location within the display area relative to said display area 602 (step 618).

The HID replicates the tile image in the on-screen frame buffer to provide the background image of the HID (Col. 4, lines 64-67):

> copying the tile image data into the frame buffer based on the replication information until the portion of the display area 602 is filled with a tiled pattern (step 620).

As shown and described in Hanko, the HID does not copy the tile image into an off-screen buffer. Instead, the HID copies and replicates the tile image into an *on-screen* buffer. Therefore,

Hanko does not teach a server that instructs the client to select a first memory region for allocation to an off-screen surface, and instructs the client to copy the graphical data associated with the indicia to a particular location within the first memory region. Further Hanko fails to suggest using an off-screen buffer because, Hanko is directed to displaying the tile image immediately, not copying the tile image to an off-screen buffer and then transferring the tile pattern to an on-screen buffer.

Also, in order to establish a prime facie case of obviousness with respect to a claim the proposed modification cannot change the principle of operation of a reference. See M.P.E.P. § 2143.01. Any hypothetical combination of Clapp and Hanko would change the principle of operation of each reference.

In Clapp, shared application image data is transferred from an off-screen frame buffer to another off-screen frame buffer, which is not immediately displayed. However, in Hanko a tile image is copied into and replicated in an on-screen image buffer, which is immediately displayed. Therefore, requiring a system such as Clapp to use an on-screen frame buffer instead of the disclosed off-screen frame buffer changes the principle of operation of Clapp. Similarly, requiring Hanko to use an off-screen buffer instead of the on-screen buffer changes the principle of operating of Hanko, which is displaying tile data immediately on the HID.

Accordingly, Clapp and Hanko, either alone or in combination, do not teach or suggest all the limitation of independent claims 1 and 12. Further, any hypothetical combination of Clapp and Hanko changes the principle of operation of each reference. As such, Applicants respectfully request Examiner to reconsider and withdraw the rejections directed to independent claims 1 and 12 and their corresponding dependent claims 2-11 and 13-20.

Rejections of claims 3, 10, 11, 13, 19, and 20 under 35 U.S.C. 103(a)

Claims 3, 10, 11, 13, 19, and 20 were rejected under 35 U.S.C. 103(a) as obvious Clapp in view of Hanko in further view of Peterson. Applicants respectfully traverse this rejection.

The arguments set forth above with respect to Clapp and Hanko are reiterated with full force and effect. Peterson does nothing to cure the deficiencies of Clapp and Hanko.

Peterson is generally directed to an information retrieval system and in particular relates to an architecture that inherently enhances the ability to intuitively obtain the highest quality information from a database locationally organized in a preferred, three-dimensional lattice. Peterson is silent as to a server that instructs the client to select a first memory region for allocation to an off-screen surface, and instructs the client to copy the graphical data associated with the indicia to a particular location within the first memory region. Therefore, any hypothetical combination of Clapp, Hanko, and Peterson fails to each or suggest each and every element of claims 3, 10, 11, 13, 19, and 20.

In view of the above arguments, the Applicants believe the pending application is in condition for allowance. Reconsideration and withdrawal of the rejection of claim 1-20 is respectfully requested.

The Applicants believe a $120 fee for a one-month extension of time is due with this statement. However, if any additional fee is due, please charge our Deposit Account No. 03-1721, under Order No. 2006579-0155 (CTX-071) from which the undersigned is authorized to draw.

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Respectfully submitted,

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